

EXHIBIT B

RULE 2004 DISCOVERY PLAN

Interrogatories

The Debtor proposes to issue not more than ten (10) Interrogatories to each Insurance Company. The Interrogatories will deal with description of the Claims management process within each Insurance Company, and will identify the names, addresses and contact information for those individuals responsible for determining coverage under the Insurance Policies for Claims made by the Tort Claimants.

Document Requests

The Debtor will issue Requests for Production of Documents or Subpoena Duces Tecum for those documents listed in the categories listed in Exhibit A.

Depositions of Insurance Company Representatives

Debtor proposes to take one (1) deposition of the representative designated pursuant to Rule 30 (b)(6) of each Insurance Company on the following subjects:

1. All considerations by each Insurance Company on the determination of the duty to defend under each Insurance Policy.
2. All considerations by each Insurance Company on the determination of the coverage or denial of coverage on each Insurance Policy for the Tort Claimants.
3. Audits, reviews or analysis of the Claims adjustment on each of the Claims made on the Insurance Policies.

PHASES OF 2004 DISCOVERY PLAN

The Debtor will issue written Interrogatories, Request for Production of Documents or Subpoena Duces Tecum for documents listed in Exhibit A no sooner than fourteen (14) days after an order is entered granting the Debtor's motion for Rule 2004 examination, and will allow each Insurance Company thirty-five (35) days to respond thereto.

Within ten (10) days after receipt of responses to the written discovery and documents detailed above, the Debtor will coordinate the setting of depositions with each Insurance Company. In the event that the parties cannot agree on the time and place for the examination, the Debtor will provide the Insurance Company with fourteen (14) days notice of the time and place for the examination.